

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

YOEL WEISSHAUS, :
Plaintiff :
vs. : Case: **11-cv-6616-RKE**
THE PORT AUTHORITY OF NEW YORK AND NEW :
JERSEY, :
Defendants. :

X

Interrogatories

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiff requests that Defendant Port Authority of New York and New Jersey answer, under oath, the following interrogatories:

1. List all the facilities that are supported from the toll revenues gathered from Surface Hudson River Crossings.
2. Do the account(s) holding toll revenues gathered from Surface Hudson River Crossings also hold revenues gathered from facilities that are not Surface Hudson River Crossings?
3. Do the account(s) that pay for capital projects of Surface Hudson River Crossings also pay for facilities that are not Surface Hudson River Crossings?

4. State with particularity the methods you employ to separate reserves gathered from Surface Hudson River Crossings from facilities that are not Surface Hudson River Crossings.

5. Define how charges for *amortization* are spent.

6. Define how charges for *depreciation reserve* are spent.

7. State the methods the Port Authority employs when deciding what the final toll price should be.

8. Define the term “funding envelope” as to how you employ that meaning.

9. Define the term “financial envelope” as to how you employ that meaning.

10. Define the term “capital plan submission vs. the financial affordability envelope” as to how you employ that meaning.

11. Define the term “unconstrained capital needs” as to how you employ that meaning.
12. Define the term “Affordability Envelope” as to how you employ that meaning.
13. State where in the annual report do you itemize expenses for capital projects.
14. State at what minimum rate should the toll price be per axel to completely satisfy all your expenses to operate the Surface Hudson River Crossings without any deficit.
15. State who (i.e. demographic, clientele, etc.) and what is your obstacle to implementing a toll price that leaves your Surface Hudson River Crossings without any deficits.
16. State for each year from 2007 to the present, the outstanding debt you had for financing the construction and maintenance of the Surface Hudson River Crossings.

17. State for each year from 2007 to the present, the outstanding debt you had for financing the construction and maintenance of all your facilities.

18. State the name(s) of each facility whose revenues are used to supplement the costs of maintaining the Surface Hudson River Crossings.

19. State all capital projects that you developed since 2007 to the present.

20. If you ever compare your toll prices with other regional providers that charge tolls, state what the practical purpose is for such comparison.

21. State what is holding you back from adding more surface crossings in addition to the current Surface Hudson River Crossings?

22. State when is the last time you reported to the States of New York and New Jersey about there is a need to add more Surface Hudson River Crossings in order to reduce congestion at current facilities?

23. In August 2011, how much was the total of capital investments that you predicted as necessary for the future of the Surface Hudson River Crossings.

24. As of August 2020, how much capital investments were spent of what you predicted in August 2011 as necessary for the Surface Hudson River Crossings.

CERTIFICATION

I, _____ certify that the following answers provided to the foregoing answers to Interrogatories are true to the best of my knowledge. I certify that I examined the records of the Port Authority of New York and New Jersey and verified that these answers are consistent with those records. I acknowledge that statements made willfully false are subject to punishment.

Dated:

RESERVATION

PLEASE TAKE NOTICE Plaintiff intends to supplement or amend the foregoing Written Interrogatories for all issues that remain open and unresponsive.